

DANIEL G. BOGDEN  
United States Attorney  
District of Nevada  
STEVEN W. MYHRE  
DANIEL R. SCHIESS  
Assistant United States Attorneys  
333 Las Vegas Boulevard South, Suite 5000  
Las Vegas, Nevada 89101  
702-388-6336

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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ASHLEE M. MARTIN,

Defendant.

2:12-cr-0400-JAD-GWF

**PLEA AGREEMENT UNDER  
FED. R. CRIM. P. 11 (c)(1)(A) and  
(B)**

**Pretrial Diversion**

**Deferred Entry of Judgment**

Plaintiff United States of America, by and through DANIEL G. BOGDEN, United States Attorney, and Steven W. Myhre and Daniel R. Schiess, Assistant United States Attorneys, the defendant, Ashlee M. MARTIN, and the defendant's attorney, Craig W. Drummond, Esq., submit this Plea Agreement under Fed. R. Crim. P. 11(c)(1)(A and B).

**I. SCOPE OF AGREEMENT**

The parties to this Plea Agreement are the United States of America and defendant, Ashlee M. Martin. This Plea Agreement binds the defendant and the United States Attorney's Office for the District of Nevada. It does not bind any

1 other prosecuting, administrative, or regulatory authority, the United States  
2 Probation Office, or the Court.

3 The Plea Agreement sets forth the parties' agreement regarding criminal  
4 charges referenced in the Plea Agreement and applicable sentences, fines,  
5 restitution and forfeiture. It does not control or prohibit the United States or any  
6 agency or third party from seeking any other civil or administrative remedies  
7 directly or indirectly against the defendant.

## 8 **II. DISPOSITION OF CHARGES AND WAIVER OF TRIAL RIGHTS**

9 A. Guilty Plea. The defendant knowingly and voluntarily agrees to plead  
10 guilty to Count 9 of the Indictment: Conspiracy to Commit Money Laundering, in  
11 violation of Title 18, United States Code, Section 1956(h).

12 B. Pretrial Diversion. Upon the Court's acceptance of the defendant's  
13 guilty plea and accompanying factual basis, the parties will request that the Court  
14 defer entry of judgment and sentencing for a period of 12 months, to commence  
15 from the date the defendant enters her plea in open court.

16 During the 12-month period, the parties agree that the defendant shall  
17 remain subject to the supervision of United States Pretrial Services and continue  
18 to follow and abide by the terms and conditions of pretrial release as set forth in  
19 the Court's Order of December 20, 2012 (Document 57), as modified by the Court's  
20 Order of January 14, 2014 (Document # 165), both of which are incorporated herein  
21 by reference (collectively referred to as "the conditions"). The conditions include,  
22 but are not limited to, the following:

- 23  
24 1. The defendant will not violate any federal, state or local law.

- 1           2.     The defendant must immediately advise the court, defense  
2           counsel, and the U.S. Attorney in writing before changing  
3           address or telephone number.
- 4           3.     The defendant must appear in court as required.
- 5           4.     The defendant must actively seek and/or maintain employment  
6           and notify U.S. Pretrial Services before making any change in  
7           employment.
- 8           5.     The defendant must maintain or commence an education  
9           program.
- 10          6.     The defendant will not use or possess any illegal controlled  
11          substances and will not knowingly associate with anyone who  
12          does.
- 13          7.     The defendant will submit to drug/alcohol testing as directed by  
14          U.S. Pretrial Services.
- 15          8.     The defendant will not possess a firearm, destructive device, or  
16          other dangerous weapon.
- 17          9.     The defendant will participate in a program of inpatient or  
18          outpatient substance abuse therapy and counseling.
- 19          10.    The defendant will refrain from any contact or communication  
20          with the co-defendants in this case and any and all victims or  
21          witnesses in this case.  
22

23           If, at the end of the 12-month period, the defendant has complied with the  
24           conditions and otherwise successfully completed the diversion period, the United

1 States will move to dismiss the charges contained in the Indictment against the  
2 defendant.

3 If, on the other hand, during that same 12-month period, the defendant  
4 violates any of the conditions contained in this agreement, as found by the  
5 Magistrate Judge after a hearing pursuant to Title 18, United States Code, Section  
6 3148, a presentence report will be ordered and the matter will be set for a  
7 sentencing hearing in the normal course of business and in accord with the agreed  
8 upon sentencing provisions contained in this Plea Memorandum.

9 The parties further agree that the Magistrate Judge shall be the final  
10 arbiter of any violation, and there will be no appeal to the district court or any  
11 higher court. In the event the Magistrate Judge finds that the defendant has  
12 violated a condition, the defendant agrees not withdraw her guilty plea.

13 The defendant is aware of the right to a speedy trial on these charges and  
14 expressly waives that right. In addition, the defendant stipulates that the time  
15 period from the proffer of this plea of guilty until the conclusion of the diversionary  
16 proceedings is excludable time pursuant to 18 U.S.C. §§ 3161(h)(2) and (7)(A).

17  
18 C. Waiver of Trial Rights. The defendant acknowledges that she has  
19 been advised and understands that by entering a plea of guilty she is waiving --  
20 that is, giving up -- certain rights guaranteed to all defendants by the laws and the  
21 Constitution of the United States. Specifically, the defendant is giving up:

22 1. The right to proceed to trial by jury on all charges, or to a trial  
23 by a judge if the defendant and the United States both agree;  
24

1           2.     The right to confront the witnesses against the defendant at  
2 such a trial, and to cross-examine them;

3           3.     The right to remain silent at such a trial, with assurance that  
4 his silence could not be used against her in any way;

5           4.     The right to testify in her own defense at such a trial if she so  
6 chooses;

7           5.     The right to compel witnesses to appear at such a trial and  
8 testify in the defendant's behalf; and

9           6.     The right to have the assistance of an attorney at all stages of  
10 such proceedings.

11           D.     Withdrawal of Guilty Plea. The defendant will not seek to withdraw  
12 her guilty plea after she has entered it in court.

13           E.     Additional Charges. The United States agrees not to bring any  
14 additional charges against the defendant arising out of the investigation in the  
15 District of Nevada which culminated in this Plea Agreement and based on conduct  
16 known to the United States.

17  
18 **III.   ELEMENTS OF THE OFFENSES**

19           Count 9: The elements of Conspiracy to Commit Money Laundering in  
20 violation of Title 18, United States Code, Section 1956(h) are as follows:

21           1.     Beginning in or around September 2002 and continuing to on or about  
22 October 2012, there was an agreement between two or more person to  
23 commit the offense of money laundering in violation of Title 18, United  
24 States Code, Section 1956(a)(1)(B)(i), as charged in the indictment; and

1        2.     The defendant became a member of the conspiracy, knowing of at  
2        least one of its objects and intending to help accomplish it.

3        The elements of Money Laundering in violation of Title 18 United States  
4        Code, Section 1956(a)(1)(B)(i) are as follows:

5        1.     The defendant conducted or intended to conduct a financial  
6        transaction involving property that represented the proceeds of wire fraud or  
7        securities fraud;

8        2.     The defendant knew that the property represented the proceeds of  
9        wire fraud or securities fraud;

10       3.     The defendant knew that the transaction was designed in whole or in  
11       part to conceal or disguise the nature, the location, the source, the ownership  
12       or control of the proceeds of wire fraud or securities fraud.

13       **IV.    FACTS SUPPORTING GUILTY PLEA**

14       A.     The defendant will plead guilty because she is, in fact and under the  
15       law, guilty of the crimes charged.

16       B.     The defendant acknowledges that if she elected to go to trial instead of  
17       pleading guilty, the United States could prove her guilt beyond a reasonable doubt.  
18       The defendant further acknowledges that her admissions and declarations of fact  
19       set forth below satisfy every element of the charged offenses.

20       C.     The defendant waives any potential future claim that the facts she  
21       admitted in this Plea Agreement were insufficient to satisfy the elements of the  
22       charged offenses.  
23  
24

1           D.     The defendant admits and declares under penalty of perjury that the  
2 facts set forth below are true and correct:

3           1.     From in or about September 2002 to in or about October 2012,  
4 defendant Thomas Cecrle and others devised and executed a scheme to defraud  
5 and to obtain money and property by means of false and fraudulent pretenses,  
6 representations, half-truths, and promises.

7           2.     The objective of the scheme and artifice was to fraudulently induce  
8 victims to invest money in fake investment programs, including non-existent land  
9 and water rights. Throughout the course and duration of the scheme, defendant  
10 Cecrle and others induced victims to invest money by using interstate wire  
11 communications and communication facilities to knowingly make false  
12 representations about the nature of the investment and to fraudulently lull  
13 investors into a false sense of security about the investment.

14           3.     To conceal and disguise the nature, location, source, ownership and  
15 control of the proceeds of the fraud, defendant Cecrle, and others, caused victims of  
16 the fraud to deposit money into bank accounts held in the name of others,  
17 thereafter withdrawing money, or causing its withdrawal, so Cecrle and others  
18 could convert the proceeds to their own use. Two such accounts were held by  
19 defendant Martin.

20           4.     In or around 2009, defendant Martin gave Cecrle permission to  
21 provide others with her bank account information and allowed Cecrle to use her  
22 accounts for his purposes. From in or around June 2009 to October 2012, numerous  
23 deposits were made into Martin's accounts from sources unknown to her, the  
24

1 deposits totaling to an amount in excess of \$1.2 million. During this same period,  
2 defendant Martin and Cecrle entered into a personal relationship and lived  
3 together at various hotel/casinos in and around Henderson and Las Vegas, Nevada.

4 5. At all relevant times, defendant Martin knew, among other things,  
5 that: (1) numerous deposits of money were made into her bank accounts from  
6 unknown sources; (2) none of the deposits was comprised of money that she or  
7 Cecrle either earned from employment or had otherwise obtained through some  
8 known legitimate means; (3) both she and defendant Cecrle withdrew money from  
9 her account to support their daily living expenses; (4) both she and defendant  
10 Cecrle withdrew money from her account to purchase Methamphetamine to  
11 support their drug habits; (6) both she and defendant Cecrle withdrew money from  
12 the account to support Cecrle's gambling habit; and (7) defendant Cecrle was  
13 known to Martin as a storyteller who, she believed, frequently spun tales in a way  
14 that made them seem believable.

15 6. The deposits into defendant Martin's account were comprised of  
16 proceeds from the wire and securities fraud scheme described above. From in and  
17 around June 2009 to October 2012, defendant Martin agreed with defendant Cecrle  
18 to engage in monetary transactions that involved the fraudulent proceeds,  
19 including ATM withdrawals and account transfers related to Martin's bank  
20 accounts as charged in Counts Seventeen through Twenty of the Indictment.

21 7. Based on her knowledge of the circumstances surrounding these  
22 events, defendant Martin knew there was a high probability that the deposits into  
23 her accounts were the result of illegal activity. Despite knowing this, she  
24



1 deliberately avoided learning the truth about the wire and securities fraud  
2 schemes described above, the proceeds resulting from the fraud, or that the  
3 transactions were designed to conceal or disguise the true source, nature and  
4 ownership of the proceeds.

## 5 **V. COLLATERAL USE OF FACTUAL ADMISSIONS**

6 The facts set forth in Section IV of this Plea Agreement shall be admissible  
7 against the defendant under Fed. R. Evid. 801(d)(2)(A) at sentencing for any  
8 purpose. If the defendant does not plead guilty or withdraws her guilty pleas, the  
9 facts set forth in Section IV of this Plea Agreement shall be admissible at any  
10 proceeding, including a trial, for impeaching or rebutting any evidence, argument  
11 or representation offered by or on the defendant's behalf. The defendant expressly  
12 waives all rights under Fed. R. Crim. P. 11(f) and Fed. R. Evid. 410 regarding the  
13 use of the facts set forth in Section IV of this Plea Agreement.

## 14 **VI. APPLICATION OF SENTENCING GUIDELINES PROVISIONS**

15 A. Discretionary Nature of Sentencing Guidelines. The defendant  
16 acknowledges that the Court must consider the United States Sentencing  
17 Guidelines ("USSG" or "Sentencing Guidelines") in determining the defendant's  
18 sentence, but that the Sentencing Guidelines are advisory, not mandatory, and the  
19 Court has discretion to impose any reasonable sentence up to the maximum term  
20 of imprisonment permitted by statute.

21 B. Offense Level Calculations. The parties stipulate to the following  
22 calculation of the defendant's offense level under the Sentencing Guidelines,  
23 acknowledge that these stipulations do not bind the Court, and agree that they will  
24

not seek to apply any other specific offense characteristics, enhancements or reductions:

Base Offense Level [USSG § 2S1.1]:	8
Enhancements:	
Value of the laundered funds [USSG § 2B1.1]	+16
Reductions:	
(USSG §§ 3E1.1(a),(b))	(3)
Total	21

The defendant acknowledges that the statutory maximum sentence and any statutory minimum sentence may limit the Court's discretion in determining the defendant's sentence notwithstanding any applicable Sentencing Guidelines provisions.

C. Reduction of Offense Level for Acceptance of Responsibility. Under USSG §3E1.1(a), the United States will recommend that the defendant receive a two-level downward adjustment for acceptance of responsibility unless she (a) fails to truthfully admit facts establishing a factual basis for the guilty plea when she enters the plea; (b) fails to truthfully admit facts establishing the amount of restitution owed when she enters his guilty plea; (c) fails to truthfully admit facts establishing the forfeiture allegations when she enters his guilty plea; (d) provides false or misleading information to the United States, the Court, Pretrial Services, or the Probation Office; (e) denies involvement in the offense or provides conflicting statements regarding his involvement or falsely denies or frivolously contests conduct relevant to the offense; (f) attempts to withdraw his guilty plea; (g)

1 commits or attempts to commit any crime; (h) fails to appear in court; or (i) violates  
2 the conditions of pretrial release.

3 Under USSG §3E1.1(b), the United States will move for an additional one-  
4 level downward adjustment for acceptance of responsibility before sentencing  
5 because the defendant communicated her decision to plead guilty in a timely  
6 manner that enabled the United States to avoid preparing for trial and to  
7 efficiently allocate its resources.

8 These Sentencing Guidelines provisions, if applied, will result in a total  
9 offense level of 21.

10 D. Criminal History Category. The defendant acknowledges that the  
11 Court may base her sentence in part on the defendant's criminal record or criminal  
12 history. The Court will determine the defendant's Criminal History Category  
13 under the Sentencing Guidelines.

14 E. Relevant Conduct. The Court may consider any counts dismissed  
15 under this Plea Agreement and all other relevant conduct, whether charged or  
16 uncharged, in determining the applicable Sentencing Guidelines range and  
17 whether to depart from that range.

18 F. Additional Sentencing Information. The stipulated Sentencing  
19 Guidelines calculations are based on information now known to the parties. The  
20 parties may provide additional information to the United States Probation Office  
21 and the Court regarding the nature, scope, and extent of the defendant's criminal  
22 conduct and any aggravating or mitigating facts or circumstances. Good faith  
23  
24

1 efforts to provide truthful information or to correct factual misstatements shall not  
2 be grounds for the defendant to withdraw his guilty plea.

3 The defendant acknowledges that the United States Probation Office may  
4 calculate the Sentencing Guidelines differently and may rely on additional  
5 information it obtains through its investigation. The defendant also acknowledges  
6 that the Court may rely on this and other additional information as it calculates  
7 the Sentencing Guidelines range and makes other sentencing determinations, and  
8 the Court's reliance on such information shall not be grounds for the defendant to  
9 withdraw his guilty plea.

## 10 VII. APPLICATION OF SENTENCING STATUTES

11 A. Maximum Penalty. The maximum penalty for Conspiracy to Commit  
12 Money Laundering under Title 18, United States Code, Section 1956(h) is 20 years'  
13 imprisonment, a \$500,000 fine, or both. 18 U.S.C. §§ 1956 (a)(1)(B) and (h).

14 B. Factors Under 18 U.S.C. § 3553. The Court must consider the factors  
15 set forth in 18 U.S.C. § 3553(a) in determining the defendant's sentence. However,  
16 the statutory maximum sentence and any statutory minimum sentence limit the  
17 Court's discretion in determining the defendant's sentence.

18 C. Parole Abolished. The defendant acknowledges that her prison  
19 sentence cannot be shortened by early release on parole because parole has been  
20 abolished.

21 D. Supervised Release. In addition to imprisonment and a fine, the  
22 defendant will be subject to a term of supervised release not to exceed 5 years. 18  
23 U.S.C. § 3583(b). Supervised release is a period of time after release from prison  
24

1 during which the defendant will be subject to various restrictions and  
2 requirements. If the defendant violates any condition of supervised release, the  
3 Court may order the defendant's return to prison for all or part of the term of  
4 supervised release, which could result in the defendant serving a total term of  
5 imprisonment greater than the statutory maximum prison sentence of 20 years.

6 E. Special Assessment. The defendant will pay a \$100 special  
7 assessment per count at the time of sentencing.

### 8 **VIII. POSITIONS REGARDING SENTENCE**

9 The United States will recommend that the Court sentence the defendant to  
10 the low-end of the Sentencing Guidelines range determined by the Court unless the  
11 defendant commits any act that could result in a loss of the downward adjustment  
12 for acceptance of responsibility. The defendant acknowledges that the Court does  
13 not have to follow that recommendation. The defendant also acknowledges that  
14 the Court does not have to grant a downward departure based on the defendant's  
15 substantial assistance to the United States, even if the United States chooses to  
16 file a motion pursuant to 18 U.S.C. § 3553(e)(1), USSG § 5K1.1, or Fed. R. Crim. P.  
17 35.  
18

19 This Plea Agreement does not require the United States to file any pre- or  
20 post-sentence downward departure motion under USSG § 5K1.1 or Fed. R. Crim. P.  
21 35. Notwithstanding its agreement to recommend a low-end sentence, the United  
22 States reserves its right to defend any lawfully imposed sentence on appeal or in  
23 any post-conviction litigation.  
24

1 The defendant may request a sentence below the Sentencing Guidelines  
2 range as calculated in this Plea Agreement pursuant to 18 U.S.C. § 3553 from any  
3 sentence the Court may impose, and the United States may oppose it.

4 **IX. RESTITUTION**

5 In exchange for benefits received under this Plea Agreement, the defendant  
6 agrees to pay restitution in the amount as determined by the Court at the time of  
7 sentencing. The defendant cannot discharge her restitution obligation through  
8 bankruptcy proceedings. The defendant acknowledges that restitution payments  
9 and obligations cannot offset or reduce the amount of any forfeiture judgment  
10 imposed in this case.

11 **X. FORFEITURE**

12 The government agrees not to seek forfeiture against the defendant for any  
13 offenses arising out of the investigation that led to the instant plea provided all  
14 other terms and conditions of this agreement remain in force.

15 **XI. FINANCIAL INFORMATION AND DISPOSITION OF ASSETS**

16 Before or after sentencing, upon request by the Court, the United States, or  
17 the Probation Office, the defendant will provide accurate and complete financial  
18 information, submit sworn statements, and/or give depositions under oath  
19 concerning her assets and her ability to pay. The defendant will surrender assets  
20 she obtained directly or indirectly as a result of her crimes, and will release funds  
21 and property under her control in order to pay any fine, forfeiture, or restitution  
22 ordered by the Court.  
23  
24

1 **XII. COOPERATION**

2       The defendant agrees, if requested by the United States, to provide complete  
3 and truthful information and testimony concerning the defendant's knowledge of  
4 all other persons who are committing or have committed offenses against the  
5 United States or any state, and agrees to cooperate fully with the United States  
6 and any state and local agencies in the investigation and prosecution of such  
7 persons. The defendant agrees that the information provided can be used against  
8 the defendant to establish relevant conduct for sentencing purposes.

9       In the event the United States Attorney decides in the sole discretion of the  
10 United States Attorney that the assistance provided by the defendant amounts to  
11 "substantial assistance" pursuant to USSG § 5K1.1, the United States will timely  
12 file a motion for downward departure from the applicable Guideline calculation.  
13 The Court has the sole discretion to grant such a motion.

14       The defendant agrees that a motion for downward departure based on  
15 substantial assistance shall not be made under any circumstances unless the  
16 defendant's cooperation is deemed to be substantial assistance by the United  
17 States Attorney. The United States has made no promise, implied or otherwise,  
18 that the defendant will be granted a departure for substantial assistance. Further,  
19 no promise has been made that such a motion will be made even if the defendant  
20 complies with the terms of this Plea Agreement in all respects but has been unable  
21 to provide substantial assistance as determined in the sole discretion of the United  
22 States Attorney.  
23  
24

1 The United States agrees to consider the totality of the circumstances,  
2 including but not limited to, the following factors, in determining whether, in the  
3 sole discretion of the United States Attorney, the defendant has provided  
4 substantial assistance which would merit a motion by the United States for a  
5 downward departure from the applicable Guideline:

6 A. The United States' evaluation of the significance and usefulness of the  
7 defendant's assistance;

8 B. The truthfulness, completeness, and reliability of any information or  
9 testimony provided by the defendant;

10 C. The nature and extent of the defendant's assistance;

11 D. Any injury suffered, or any danger or risk of injury to the defendant or  
12 the defendant's family resulting from the defendant's assistance; and

13 E. The timeliness of the defendant's assistance.

14  
15 The defendant agrees that in the event the United States files a downward  
16 departure motion based upon the defendant's substantial assistance, the United  
17 States reserves the right to make a specific recommendation to the Court regarding  
18 the extent of such a departure. The defendant understands and agrees that the  
19 final decision as to how much of a departure, if any, is warranted rests solely with  
20 the Court.

21 The defendant agrees that if the United States determines that the  
22 defendant has not provided full and truthful cooperation, or has committed any  
23 federal, state or local crime between the date of this agreement and the defendant's  
24 sentencing, or has otherwise violated any provision of this agreement, then (a) the



1 agreement and any of its obligations hereunder may be voided by the United States  
2 in its sole discretion, (b) the defendant may not withdraw the guilty plea, and (c)  
3 the defendant shall be subject to prosecution for all federal criminal offenses of  
4 which the United States has knowledge, including but not limited to, perjury and  
5 obstruction of justice. Any such prosecution may be based upon any information  
6 provided by the defendant or leads derived therefrom.

7 **XIII. THE DEFENDANT'S ACKNOWLEDGMENTS AND WAIVERS**

8 A. Plea Agreement and Decision to Plead Guilty. The defendant  
9 acknowledges that:

10 (1) She has read this Plea Agreement and understands its terms  
11 and conditions;

12 (2) She has had adequate time to discuss this case, the evidence,  
13 and this Plea Agreement with his attorney;

14 (3) She has discussed the terms of this Plea Agreement with his  
15 attorney;

16 (4) The representations contained in this Plea Agreement are true  
17 and correct, including the facts set forth in Section IV; and

18 (5) She was not under the influence of any alcohol, drug, or  
19 medicine that would impair her ability to understand the Agreement when she  
20 considered signing this Plea Agreement and when she signed it.

21 The defendant understands that she alone decides whether to plead guilty or  
22 go to trial, and acknowledges that she has decided to enter her guilty plea knowing  
23 of the charges brought against her, her possible defenses, and the benefits and  
24

1 possible detriments of proceeding to trial. The defendant also acknowledges that  
2 she decided to plead guilty voluntarily and that no one coerced or threatened her to  
3 enter into this Plea Agreement.

4 B. Waiver of Appeal and Post-Conviction Proceedings. The defendant  
5 knowingly and expressly waives: (a) the right to appeal any sentence imposed  
6 within or below the applicable Sentencing Guideline range as determined by the  
7 Court; (b) the right to appeal the manner in which the Court determined that  
8 sentence on the grounds set forth in 18 U.S.C. § 3742; and (c) the right to appeal  
9 any other aspect of the conviction or sentence and any order of restitution or  
10 forfeiture.

11 The defendant also knowingly and expressly waives all collateral challenges,  
12 including any claims under 28 U.S.C. § 2255, to her conviction, sentence, and the  
13 procedure by which the Court adjudicated guilt and imposed sentence, except non-  
14 waivable claims of ineffective assistance of counsel.

15 C. Removal/Deportation Consequences. The defendant understands and  
16 acknowledges that if she is not a United States citizen, then it is highly probable  
17 that she will be permanently removed (deported) from the United States as a  
18 consequence of pleading guilty under the terms of this Plea Agreement. The  
19 defendant has also been advised if her conviction is for an offense described in 8  
20 U.S.C. § 1101(a)(43), she will be deported and removed from the United States and  
21 will not be allowed to return to the United States at any time in the future. The  
22 defendant desires to plead guilty regardless of any immigration consequences that  
23 may result from her guilty plea, even if the consequence is automatic removal from  
24

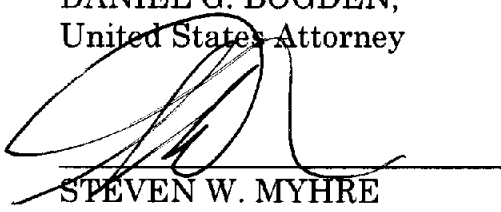
the United States with no possibility of returning. The defendant acknowledges that she has specifically discussed these removal/deportation consequences with his attorney.

#### XIV. ADDITIONAL ACKNOWLEDGMENTS

This Plea Agreement resulted from an arms-length negotiation in which both parties bargained for and received valuable benefits in exchange for valuable concessions. It constitutes the entire agreement negotiated and agreed to by the parties. No promises, agreements or conditions other than those set forth in this agreement have been made or implied by the defendant, the defendant's attorney, or the United States, and no additional promises, agreements or conditions shall have any force or effect unless set forth in writing and signed by all parties or confirmed on the record before the Court.

DANIEL G. BOGDEN,  
United States Attorney


DATE 8/1/2014

  
STEVEN W. MYHRE  
DANIEL B. SCHIESS  
Assistant United States Attorneys

DATE July 31, 2014 -

  
CRAIG W. DRUMMOND  
Counsel for the Defendant Ashlee Martin

DATE July 31, 2014 -

  
ASHLEE M. MARTIN  
Defendant